

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:	:	Chapter 13
	:	
Cynthia King	:	Case No. 21-11275-ELF
Debtor	:	
	:	

**MOTION TO EXPEDITE HEARING ON DEBTOR'S  
MOTION TO SELL REAL PROPERTY FREE AND CLEAR**

Cynthia King, (the “Debtor”), by and through her attorneys, hereby submits this Motion to Expedite Hearing on Debtor’s Motion to Sell Real Property Free and Clear (the “Motion”), and in support thereof respectfully submits as follows:

1. The Debtor filed a voluntary petition under chapter 13 the Bankruptcy Code on May 03, 2021 (the “Petition Date”).
2. On June 01, 2021, the Debtor filed her schedules of assets and liabilities and statement of financial affairs (the “Schedules”).
3. The Schedules reflect, among other things, that the Debtor owns real property located at 4104 Sofia Lane, Boothwyn, Pennsylvania.
4. On or about September 24, 2021, the Debtor and Theresa Costa (the “Buyer”) entered into a Contract for Purchase of the Property (the “Sales Contract”) for a purchase price of Two Hundred Fifty-Five Thousand Dollars (\$255,000.00). A copy of the Sales Contract is attached as Exhibit A to the Motion.
5. On October 07, 2021, the Debtor filed the Motion to sell the Property [D.I. No. ]
6. Cause exists for an expedited hearing because closing on the Property is scheduled to occur on November 04, 2021, which is the same date that the Motion would be heard absent expedited relief pursuant to the Court’s calendar.

7. Extending the closing date of the Property runs the risk of the Buyer walking away from purchasing the Property. Prior to this Buyer, the Debtor had a previous buyer walk away from the Property due to the inability to close quickly.

8. Accordingly, for the reasons stated above, cause exists for an expedited hearing on the Debtor's Motion to Vacate Dismissal Order.

9. Counsel to the NEWREZ LLC d/b/a Shellpoint Mortgage Servcing, the mortgagee of the Property, has consented to an expedited hearing pursuant to L.B.R. 5070-1 Subdivision (g).

WHEREFORE, Debtor respectfully requests that this Honorable Court grant this Motion and set a hearing date on or before October 28, 2021.

Dated: October 08, 2021

Respectfully submitted,

**JENSEN BAGNATO, P.C.**

By: /s/ Jeffrey M. Carbino

Jeffrey M. Carbino (P.A. 71614)

1500 Walnut Street Suite 1510

Philadelphia, PA 19102

Telephone: (215) 546-4700/Fax: (215) 546-7440

Email: [jeffrey@jensenbagnatolaw.com](mailto:jeffrey@jensenbagnatolaw.com)

*Counsel to the Debtor*